

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 04-30072-MAP

JOSEPH ROSEMOND, )  
COMPLAINANT )  
v. )  
STOP AND SHOP, )  
RESPONDENT )  
\_\_\_\_\_ )

**JOINT STATEMENT OF THE PARTIES IN  
PREPARATION FOR SCHEDULING CONFERENCE**

The parties, by their respective counsel, file the following joint statement in accordance with the Notice of Scheduling Conference dated May 25, 2004, Fed. R. Civ. P. 26 and Local Rule 16.1 of the United States District Court of Massachusetts.

I. Joint Discovery Plan

- A. Initial disclosures to be made on or before July 13, 2004.
- B. Written discovery requests to be served by October 14, 2004.
- C. Non-expert depositions to be completed by January 10, 2005.
- D. Plaintiff to disclose expert witnesses by March 15, 2005.
- E. Defendant to disclose expert witnesses by April 15, 2005.
- F. Expert discovery, including, without limitation, depositions, if any, to be completed by June 1, 2005.

The parties will engage in settlement discussions prior to the commencement of fact depositions. If the parties are unable to resolve the case at this juncture, they will proceed with fact discovery and will reassess settlement before beginning expert discovery.

Proposed Schedule for Filing Motions

- A. All parties will be joined and pleadings will be amended by July 19, 2004.
- B. Dispositive motions to be filed by July 1, 2005.
- C. Oppositions to dispositive motions to be filed no later than twenty-one (21) days after the filing of any dispositive motion.

III. Certifications

The certifications of the parties are submitted under separate cover.

Respectfully submitted,

THE PLAINTIFF,  
By His Attorney

THE DEFENDANT,  
By Its Attorney

By: Tani E. Sapirstein  
Tani E. Sapirstein  
BBO 236850  
Sapirstein & Sapirstein, P.C.  
1341 Main Street – 3<sup>rd</sup> Floor  
Springfield, MA 01103  
Phone: (413) 827-7500  
Fax: (413) 827-7797

By: Lisa J. Damon  
Lisa J. Damon  
BBO# 558843  
Damian W. Wilmot  
BBO# 648693  
Seyfarth Shaw LLP  
World Trade Center East  
Two Seaport Lane, Suite 300  
Boston, MA 02210-2028  
Phone: (617) 946-4800

Dated: June 24, 2004

Proposed Schedule for Filing Motions

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Tani E. Sapirstein  
BBO 236850  
Sapirstein & Sapirstein, P.C.  
1341 Main Street - 3<sup>rd</sup> Floor  
Springfield, MA 01103  
Phone: (413) 827-7500  
Fax: (413) 827-7797

THE DEFENDANT,  
By Its Attorney

By: \_\_\_\_\_  
Lisa J. Damon  
BBO# 558843  
Damian W. Wilmot  
BBO# 648693  
Seyfarth Shaw LLP  
World Trade Center East  
Two Seaport Lane, Suite 300  
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